

**Hearing Date and Time: December 6, 2011 at 10:00 a.m. (Prevailing Eastern Time)**  
**Objection Deadline: November 10, 2011**

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Counsel for Wellmont Health System

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	<b>08-13555 (JMP)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	:	
-----X	:	

**OBJECTION OF WELLMONT HEALTH SYSTEM TO DEBTORS'  
PROPOSED ASSUMPTION OF CERTAIN EXECUTORY CONTRACTS**

Wellmont Health System ("Wellmont"), a creditor, swap counterparty and party in interest, objects to the proposed assumption of certain executory contracts between Lehman Brothers Special Financing Inc. and Wellmont (the "Contracts") pursuant to the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings, Inc. and its Affiliated Debtors [Docket Nos. 19627 and 21254] (the "Plan"), as follows:

1. Wellmont is a counterparty to the Contracts, including, but not limited to, those certain derivatives contracts described in Exhibit 2 to the Plan.

2. Wellmont does not consent to the assumption of the Contracts on the terms proposed by the Debtors.

3. Wellmont reserves all rights, claims and interests.

/s/Patrick Darby

Patrick Darby (*Admitted Pro Hac Vice*)

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